

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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*Southern District of New York  
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August 31, 2021

[VIA ECF AND EMAIL]

The Honorable Nelson S. Román  
United States District Court Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Deft's request to adjourn the jury trial from Dec. 1, 2021 or, alternatively, Dec. 6, 2021 until April 25, 2022 or, alternatively, May 2, 2022 is granted without objection from the Gov't. The Court will issue an order setting forth the trial document deadlines. Clerk of Court requested to terminate the motion (doc. 43)

Dated: Sept. 5, 2021  
White Plains, NY

**SO ORDERED:**

Re: *United States v. Vania Bell*, 19 CR 550 (NSR)

Dear Honorable Judge Román:

**HON. NELSON S. ROMÁN  
UNITED STATES DISTRICT JUDGE**

I write regarding the above captioned matter. Ben Gold and I have taken over the representation of Ms. Bell upon Susanne Brody's retirement last month. It is our understanding that the Court was looking to schedule the trial of this matter later this year.

As we are just taking over the matter, Mr. Gold and I require additional time to familiarize ourselves with the case. In addition, there is a significant amount of discovery that we will need to review in order to be able to try the case. We are therefore respectfully requesting that the Court set this matter for trial in the Second Quarter of 2022 and we would consent to the exclusion time under the Speedy Trial Act.

Our understanding is that either April 25, 2022 or May 2, 2022 are available for trial. We have no conflicts with either of those dates. The government, through Assistant United States Attorney Vladislav Vainberg, has no objection to this request and would also be available for trial on either of those dates. We have consulted with Ms. Bell and she has no objection to this request. Therefore, we respectfully request that the Court grant this application and set the matter for trial on either April 25, 2022 or May 2, 2022.

Respectfully submitted,



Elizabeth K. Quinn  
Counsel for Ms. Bell

cc: Vladislav Vainberg, A.U.S.A. (via electronic mail)

